

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

ENVER JOSE MORALES-HOYOS,
CARLOS ALBERTO MORALES-HOYOS,
GEOFFREY MORSE,
EDDIL ORTEZ,
ELIJAH COX,
TIMOTHY WHEELER,
CHRISTIAN MUNIZ-PERKINS,
CORTNY REICHERT,
JEFFREY ROY,
ALYSHA DEJESUS, and
JAMES HENRY,

Defendants.

No. 19-CR-135-01/11-PB

21 U.S.C. §§ 841(a)(1), 841(b)(1), & 846
Conspiracy to Distribute Controlled Substances and
Attempted Possession of Controlled Substances
with Intent to Distribute

18 U.S.C. § 924(c)(1)(A)(i)
Using and Carrying a Firearm During and in
Relation to a Drug Trafficking Crime

INDICTMENT

The Grand Jury charges:

Count One

**[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), & 846 - Conspiracy to
Distribute Controlled Substances]**

Beginning on a date unknown to the grand jury and continuing to on or about June 26,
2019, in the District of New Hampshire and elsewhere, the defendants,

ENVER JOSE MORALES-HOYOS;
CARLOS ALBERTO MORALES-HOYOS;
GEOFFREY MORSE;
EDDIL ORTEZ;
ELIJAH COX;
TIMOTHY WHEELER;
CHRISTIAN MUNIZ-PERKINS;
CORTNY REICHERT;
JEFFREY ROY;
ALYSHA DEJESUS; and
JAMES HENRY,

knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to distribute controlled substances, specifically, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl; cocaine; and cocaine base, all Schedule II Controlled Substances, in violation of 21 United States Code, Sections 841(a)(1) and 846.

The conduct of ENVER JOSE MORALES-HOYOS and CARLOS ALBERTO MORALES-HOYOS, as members of the conspiracy charged above, which included the reasonably foreseeable conduct of other members of the conspiracy, involved 400 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, and 280 grams and more of a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, in violation of 21 United States Code, Section 841(b)(1)(A); and 500 grams and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of 21 United States Code, Section 841(b)(1)(B).

GEOFFREY MORSE's conduct as a member of the conspiracy charged above, which included the reasonably foreseeable conduct of other members of the conspiracy, included 400 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, in violation of 21 United States Code, Section 841(b)(1)(A); and 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, in violation of 21 United States Code, Section 841(b)(1)(B).

The conduct of EDDIL ORTEZ, ELIJAH COX, and ALYSHA DEJESUS as members of the conspiracy charged above, which included the reasonably foreseeable conduct of other members of the conspiracy, included 40 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, in violation of 21 United States Code, Section 841(b)(1)(B).

Count Two

[21 U.S.C. §§ 841(a)(1), (b)(1)(C), & 846 - Attempted Possession of Controlled Substances with Intent to Distribute]

On or about June 19, 2019, in the District of New Hampshire, the defendant,

GEOFFREY MORSE,

knowingly and intentionally attempted to possess with intent to distribute controlled substances, specifically, fentanyl, cocaine, and cocaine base, all Schedule II Controlled Substances, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Three

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), & 846 - Attempted Possession of Controlled Substances with Intent to Distribute]

On or about June 20, 2019, in the District of New Hampshire, the defendant,

EDDIL ORTEZ,

knowingly and intentionally attempted to possess with intent to distribute a controlled substance, specifically, cocaine, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Four
**[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), & 846 - Attempted Possession of
Controlled Substances with Intent to Distribute]**

On or about June 20, 2019, in the District of New Hampshire, the defendant,

ELIJAH COX,

knowingly and intentionally attempted to possess with intent to distribute controlled substances, specifically, 40 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846; and cocaine, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Five
**[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), & 846 - Attempted Possession of Controlled
Substances with Intent to Distribute]**

On or about June 19, 2019, in the District of New Hampshire, the defendant,

TIMOTHY WHEELER,

knowingly and intentionally attempted to possess with intent to distribute controlled substances, specifically, fentanyl and cocaine base, both Schedule II Controlled Substances, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Six
[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), & 846 - Attempted Possession of Controlled Substances with Intent to Distribute]

On or about June 19, 2019, in the District of New Hampshire, the defendants,

CHRISTIAN MUNIZ-PERKINS and CORTNY REICHERT,

knowingly and intentionally attempted to possess with intent to distribute a controlled substance, specifically, fentanyl, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Seven
[18 U.S.C. § 924(c)(1)(A)(i) – Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime]

On or about June 19, 2019, in the District of New Hampshire, the defendant,

CHRISTIAN MUNIZ-PERKINS,

did knowingly use and carry firearms, that is, a Davis Industries derringer and an American Bulldog revolver, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Attempted Possession of Controlled Substances with Intent to Distribute in violation of 21 United States Code, Sections 841(a)(1) and 846; all in violation of 18 United States Code, Section 924(c)(1)(A)(i).

Count Eight
[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), & 846 - Attempted Possession of Controlled Substances with Intent to Distribute]

On or about June 19, 2019, in the District of New Hampshire, the defendant,

JEFFREY ROY,

knowingly and intentionally attempted to possess with intent to distribute a controlled substance, specifically, fentanyl, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Nine
[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), & 846 - Attempted Possession of Controlled Substances with Intent to Distribute]

On or about June 24, 2019, in the District of New Hampshire, the defendant,

ALYSHA DEJESUS,

knowingly and intentionally attempted to possess with intent to distribute controlled substances, specifically, 40 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846; and cocaine, a Schedule II Controlled Substance, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

Count Ten
[21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), & 846 - Attempted Possession of Controlled Substances with Intent to Distribute]

On or about June 25, 2019, in the District of New Hampshire, the defendant,

JAMES HENRY,

knowingly and intentionally attempted to possess with intent to distribute controlled substances, specifically, fentanyl and cocaine base, both Schedule II Controlled Substances, in violation of 21 United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

**NOTICE OF CRIMINAL FORFEITURE PURSUANT TO
18 U.S.C. § 924(d); 21 U.S.C. § 853; and 28 U.S.C. § 2461(c)**

A. FORFEITABLE PROPERTY

The above allegations of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. 924(d) and 21 U.S.C. § 853(a)(1-2). Upon conviction of the offenses charged above in this Indictment, the defendants shall forfeit to the United States:

(a) any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of the charged violations of Title 21;

(b) any property in which the defendant has any interest which was used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations of Title 21; and

(c) all firearms and ammunition involved in the commission of the charged violations of Title 18, United States Code, Section 924(c), including but not limited to the firearms listed above.

A TRUE BILL

Dated: June 26, 2019

/s/ Grand Jury Foreperson
Foreperson of the Grand Jury

SCOTT W. MURRAY
United States Attorney
District of New Hampshire

By: /s/ Jarad E. Hodes
Jarad E. Hodes
Assistant United States Attorney